

**BEFORE THE ILLINOIS COMMERCE COMMISSION  
STATE OF ILLINOIS**

Illinois Commerce Commission  
On Its Own Motion

Revision of 83 Ill. Adm. Code 280

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**No. 06-0703**

**VERIFIED PETITION TO INTERVENE OF AARP  
AND REQUEST TO APPEAR PRO HAC VICE**

COMES NOW **AARP**, by and through counsel, pursuant to the Illinois Commerce Commission ("Commission") Rules of Practice, 83 Ill. Adm. Code, Section 200.200, hereby petitions for intervention as a party in the above captioned case involving a proposed revision to the sections of the Commission's rules that have a significant impact on the billing practices that relate to residential utility consumers.

In support of this application, AARP states as follows:

1. AARP is a nonprofit, nonpartisan membership organization that advocates for people who are 50 years of age and older, seeking to promote their independence, choice and control in ways that are beneficial and affordable to them and to society as a whole.<sup>1</sup> AARP operates staffed offices in all 50 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. There are approximately 1.7 million AARP members currently residing in the state of Illinois.

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<sup>1</sup> In 1999, the "American Association of Retired Persons" changed its name to simply "AARP", in recognition of the fact that people do not have to be retired to be members. AARP is incorporated as a 501(c)(4) organization. Its affiliated AARP Foundation is incorporated as a 501(c)(3) organization.

2. AARP promotes the well-being of older persons through advocacy, education, and service on a number of priority issues. AARP has determined that advocacy for reasonable utility rates and service for seniors is one of these priority issues. AARP's interest in this matter relates to the manner in which proposed revisions to Part 280 may impact those older Illinois customers who are receiving service from regulated utilities in Illinois.

3. AARP agrees to accept service by electronic means as provided for in Section 200.1050 of the Commission's Rules of Practice. 83 Ill. Adm. Code §200.1050.

4. Furthermore, pursuant to Illinois Supreme Court Rule 707 and Illinois Commerce Commission Rules of Practice, 83 Ill. Adm. Code, Section 200.90(a), the undersigned counsel requests permission to appear in the above-captioned administrative proceeding on a *pro hac vice* basis. The undersigned counsel has over 18 years of experience practicing before public utility commissions, including rate cases before this Commission. The undersigned counsel is a member in good standing of the Missouri Bar and is not disqualified from appearing in any Missouri court. The state of Missouri permits visiting attorneys, including Illinois attorneys, to practice before its Public Service Commission in a *pro hac vice* capacity in similar situations. Missouri Public Service Commission Rule 4 CSR 240-2.040(3)(C). The undersigned counsel agrees to abide by the Illinois Commerce Commission Rules of Practice and the Illinois Rules of Professional Conduct.

7. Correspondence, communications, orders and the decision in this matter should be addressed to:

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WHEREFORE, AARP respectfully requests that the Commission grant its Verified Petition to Intervene, entitling it to fully participate in this proceeding, and permitting its undersigned counsel to appear *pro hac vice* in this proceeding.

Respectfully submitted,

  
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Attorney for AARP

Dated: this 18th day of July, 2008.

STATE OF MISSOURI                     )  
                                                      )  
COUNTY OF ST. LOUIS COUNTY        )

**VERIFICATION**

I, John Coffman, hereby affirm that I have knowledge of the contents of the foregoing Verified Petition to Intervene and Request to Appear Pro Hac Vice and it is true and accurate to the best of my knowledge.

  
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John B. Coffman  
Attorney for AARP

SUBSCRIBED AND SWORN TO before me, a Notary Public, on this 18<sup>th</sup> day of July, 2008.

  
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NOTARY PUBLIC



MISTI L. MCKINLEY  
My Commission Expires  
June 28, 2012  
St. Louis County  
Commission #08417907

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